Amendments to the Drawings:

The attached sheets of drawings include changes to Figures 2 and 3. These sheets, which include Figures 2 and 3, replace the original sheets including Figures 2 and 3. In Figure 2, previously omitted element 28 has been added. In Figure 3, previously omitted element 128 has been added.

REMARKS/ARGUMENTS

Applicant has carefully reviewed and considered the Office Action mailed on November 19, 2004, and the references cited therewith.

Claims 1, 26, 28, and 32 are amended, no claims are canceled, and no claims are added; as a result, claims 1-32 are now pending in this application.

§102 Rejection of the Claims

Claims 1, 16, and 26 were rejected under 35 USC §102(e) as being anticipated by Kohler (U.S. Patent No. 6,778,300).

In the office action, the Examiner cited various embodiments described in the Kohler reference as describing "an open color manager to link a given input device with a selected output device, including a configuration to parse an input color space data set comprising black plus multiple color channels with the input and output color profiles at a job time to create an output color space data set comprising black plus multiple color channels for imaging by said selected output device while substantially preserving black channel information."

The Kohler reference appears to describe a color management module that uses a BGA Tag (i.e., black generation algorithm) to determine a black channel component of a source device color profile. (See Col. 3, lines lines 45-50 of the Kohler reference). The Kohler reference further describes that the algorithm, used to obtain the black channel component of the source device color profile, is folded into the CMY color data of the source color profile in an inverse manner (i.e., the algorithm is inversely folded into the CMY source color data). (See Col. 10, lines 44-49 of the Kohler reference).

The CMY color data with the inverse black generation algorithm is then transformed into a device independent profile connection space (PCS) by the color management module. (See Col. 10, lines 57-62 of the Kohler reference). The color management module then transforms the PCS color data with the inverse black generation algorithm to a CMY destination color data. (See Col. 10, lines 64-67 of the Kohler reference). In addition, the color management module applies the source black generation algorithm that was inversely folded into the CMY source color data to the CMY destination color data in order to

generate CMYK destination color data. (See Col. 11, lines 2-7 of the Kohler reference).

In contrast, Applicant's independent claim 1, as amended, recites, besides other things:

> an open color manager to link a given input device with a selected output device, including a configuration to parse an input color space data set comprising black channel data plus multiple color channel data with the input and output color profiles at a job time to create a profile connection space including transformed multiple color channels plus the input black channel data to provide an output color space data set comprising the input black channel data plus the transformed multiple color channels for imaging by said selected output device while substantially preserving the input black channel data.

The Kohler reference does not use the input black channel data, but rather uses a black generation algorithm to obtain the black channel component of the source device and that same algorithm is inversely folded into the CMY color channels before the source device color data is transformed into the profile connection space (PCS).

As such, each and every element of Applicant's independent claim 1 is not taught in the Kohler reference. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the §102 rejection for independent claim 1, as well as those claims which depend therefrom.

With regard to claim 26, in the office action, the Examiner cited Col. 6, lines 2-5 of the Kohler reference, as describing connecting a plurality of input devices and a plurality of output devices to a network space. Further, the Examiner cited Fig. 5, and elements 180, 185, and 144 of the Kohler reference, as describing linking an input color profile with an output color profile.

The Kohler reference appears to describe computing equipment that may acquire digital image data from other sources such as a digital video camera or from a local area network or the Internet via network interface bus. (See Col. 6, lines 105 of the Kohler reference). That is, the Kohler reference includes a computing device that can receive digital image data over the internet.

In contrast, Applicant's independent claim 26, recites, besides other things:

linking an input color profile with an output color profile over the network space.

The Kohler reference does not describe linking an input color profile with an output color profile over the network space.

As such, each and every limitation of Applicant's independent claim 26 is not shown by the Kohler reference. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the §102 rejection of claim 26.

§103 Rejection of the Claims

Claims 19, 20, 21, 25, 28, 29, 30, and 32 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Drakopoulos, et al. (U.S. Patent No. 6,480,299), and further in view of Edge, et al. (U.S. Patent No. 6,088,038). Since claims 19, 20, 21, and 25 depend from allowable claim 1, Applicant asserts claims 19, 20, 21, and 25 are allowable.

With respect to independent claim 28, in the office action, the Examiner cited Col. 9, lines 5-12; and Col. 11, lines 35-45 of the Kohler reference as describing a processing means for transforming an input color space dataset to a profile connection space while maintaining input black information.

In contrast, Applicant's independent claim 28, as amended, recites, besides other things:

> a processing means for transforming an input color space dataset to
> a profile connection space while maintaining input black
> information intact;

The Applicant asserts that neither the Kohler reference nor the Drakopoulos et al. reference teach "a processing means for transforming an input color space dataset to a profile connection space while maintaining input black information intact."

The Drakopoulos et al. reference fails to cure the deficiencies of the Kohler reference. The Drakopoulos et al. reference appears to describe a CMS tool that uses artificial neural networks for performing efficient color space conversion. (See Col. 7, lines 16-18 of the Drakopoulos et al. reference). The Applicant was unable to locate, anywhere in the Drakopoulos et al. reference a teaching and/or suggestion of a processing means for transforming an input color

space dataset to a profile connection space while maintaining input black information <u>intact</u>.

As such, Applicant respectfully submits that the combination of references does not teach or suggest, either independently or in combination, each and every element of independent claim 28. Since each and every element and limitation of independent claim 28 is neither taught nor suggested in the combination of references, Applicant believes that independent claim 28 is in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the §103 rejection, as well as those claims which depend therefrom.

With respect to independent claim 32, in the office action, the Examiner cited Col. 9, lines 5-12; and Col. 11, lines 35-45 of the Kohler reference and Col. 4, lines 28-31 of the Edge references as describing "an input look-up table for conversion from said input color space dataset to CIE L*a*b* profile connection space while preserving any input black information."

For the reasons provided above in connection with Applicant's independent claims 1 and 28, the Applicant asserts that neither the Kohler reference nor the Edge reference teach "an input look-up table for conversion from said input color space dataset to CIE L*a*b* profile connection space <u>without converting</u> any input black information, as described by Applicant's independent claim 32, as amended.

In contrast, Applicant's independent claim 32, as amended, recites, besides other things:

> an input look-up table for conversion from said input color space dataset to CIE L*a*b* profile connection space without converting any input black information

As such, Applicant respectfully submits that the combination of references does not teach or suggest, either independently or in combination, each and every element of independent claim 32. Since each and every element and limitation of independent claim 32 is neither taught nor suggested in the combination of references, Applicant believes that independent claim 32 is in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the §103 rejection, as well as those claims which depend therefrom.

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Claims 2 and 6 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Ohta, et al. (U.S. Patent No. 6,268,930). Claims 3, 7, 9, 11 and 13 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Veilleux, et al. (U.S. Publication No. 2002/0161659).

Further, claims 4, 5, 8, 10, and 12 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Ohta, et al. (U.S. Patent No. 6,268,930), and further in view of Veilleux, et al. (U.S. Publication No. 2002/0161659). Claim 14 was rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Takahaski (U.S. Patent No. 6,697,167).

Claim 15 was also rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Brown, et al. (U.S. Patent No. 6,595,612). Claims 17 and 18 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Drakopoulos, et al. (U.S. Patent No. 6,480,299).

Claims 22 and 31 were rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Drakopoulos, et al. (U.S. Patent No. 6,480,299), further in view of Edge, et al. (U.S. Patent No. 6,088,038), and further in view of Newman (U.S. Patent No. 6,633,668). Claim 23 was rejected under 35 USC §103(a) as being unpatentable over Kohler (U.S. Patent No. 6,778,300) in view of Drakopoulos, et al. (U.S. Patent No. 6,480,299), further in view of Edge, et al. (U.S. Patent No. 6,088,038) and further in view of Takahashi (U.S. Patent No. 6,697,167).

None of the above references cure the deficiencies of the Kohler reference. Accordingly, since the claims, rejected under 35 U.S.C. §103(a) above, are dependent upon one of the independent claims 1, 26, or 28, the dependent claims are deemed allowable based upon the arguments provided herein with respect to the claims to which each depends.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (360) 212-0769 to facilitate prosecution of this matter.

CERTIFICATE UNDER 37 CFR §1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: **MS AMENDMENT** Commissioner of Patents, P.O. BOX 1450, Alexandria, VA 22313-1450 on this _18th_ day of _February_, 2005.

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